

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF PENNSYLVANIA

ARONDA D. BROOKINS

Plaintiffs,

November 12, 2007

V.

RED CLAY CONSOLIDATED SCHOOL DISTRICT
Defendant.

C.A. N. 07-3374

PLAINTIFFS RESPONSE AND DISAGREEMENT TO
DEFENDANT'S MOTION TO DISMISS FOR
IMPROPER VENUE

On September 4, 2007 I filed a complaint against Red Clay Consolidated School District with respect to an improper employment termination and violation of my civil rights due to my criminal background, which is 17 ½ years old.

I am in disagreement with the defendant's motion to dismiss my case and I offer the following:

1. I was successfully employed with Red Clay from 1995-1999 and resigned in good standing after the tragic death of my mother and husband six months apart.
2. I was re-hired by Red Clay in September of 2005 in the Human Resources Department as a floating clerk with the same criminal background I was hired with in 1995. I received a favorable evaluation upon completion of their probationary period.

3. On or about March 8, 2006 I was covering for an absent secretary in a school when I received a hand delivered inter-office letter from Ms. Debra Davenport that I was to meet with her in her office on March 10, 2006 and advised to have union representation attend the meeting with me. Unfortunately, the Union Representation was out of town after asking for the 48-hour extension as noted in our Union Contract. (See attached) Ms. Davenport denied me the extension and terminated me by mail for an unfavorable criminal background after six months of successful employment.
4. I went to Delaware Labor Law Department to seek help for what I felt is wrongful termination and was directed to the US Equal Employment Opportunity Commission (EEOC) located in Philadelphia Pennsylvania. I received a final right to sue letter from the EEOC indicating that I may file suit in a United States Federal District Court and the closest US Federal District Court to my residing in Delaware is the Federal Court located in Philadelphia Pennsylvania.
5. Finally, I presently cannot afford an attorney to help me with my case. However, I am certain that I was wrongfully terminated from Red Clay School District for a criminal history that I had been hired with back in 1995 and worked until 1999. Then, re-hired with the same criminal history again in September 2005 until being stripped of my civil rights in March 2006 for something Red Clay was already aware of. I was not

aware that filing suit in US Federal Court in Pennsylvania was wrong. I simply followed directions from professional people who I felt was leading me in the right direction. When I first contacted the Federal Court in Pennsylvania, I was informed I could file there and proceeded to do so.

6. Remedy Sought: Reinstated to a position with back pay

In conclusion, for the above stated reasons, I Aronda D. Brookins (Plaintiff) plead with the court to not dismiss my claims against Red Clay for improper venue.

cc: Judge Katz
John D. Balaguer
(Attorney for Red Clay Consolidated School District)

ARONDA D. BROOKINS,
(Plaintiff,)

C.A. NO 07-3374

V.

RED CLAY CONSOLIDATED
SCHOOL DISTRICT (Defendant.)

CERTIFICATE OF SERVICE

I Aronda D. Brookins Pro se do hereby certify that on this 4th day of December, 2007 two copies of the foregoing Plaintiffs Response And Disagreement To Defendant's Motion to Dismiss For Improper Venue are mailed U.S. First Class Mail, postage prepaid to the Honorable Judge Katz and the defendant's Attorney John D. Balaguer

**Aronda D. Brookins
108 Chestnut Ave apt #2
Wilmington, DE 19805**